UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

In re:

1st ROCHDALE COOPERATIVE GROUP, LTD.

Debtor.

ROBERT L. GELTZER, as Chapter 7 Trustee for 1st ROCHDALE COOPERATIVE GROUP, LTD.,

Plaintiff.

v.

GARY ALTMAN, RHODA BROWN, "JOHN DOE 1" AS EXECUTOR OR ADMINISTRATOR OF THE ESTATE OF GEORGE CRETHAN, SAUL MILDWORM, JACK RASKIN, DAVID SMITH, FRANCIS CONNOLLY and JOAN KRAMER AS EXECUTORS OF THE ESTATE OF ALLEN THURGOOD, EDWARD YAKER, GREGORY WORTHAM and DAVID L. JOHNSON,

Defendants.

Bankruptcy Proceeding Chapter 7 Case No. 05-12086 (PCB)

07 CV 7852 (DC)

ECF Case

DECLARATION OF JONATHAN D. PRESSMENT

Jonathan D. Pressment, hereby declares, pursuant to 28 U.S.C. § 1746:

- 1. I am a member of Haynes and Boone, LLP, attorneys for defendants, Francis
 Connolly and Joan Ramer, as co-executors of the Estate of Allen Thurgood ("Estate of
 Thurgood"). This declaration is submitted to provide the Court with documents pertinent to the
 Estate of Thurgood's motion to dismiss Counts Three and Four of the Complaint in this action.
- 2. A true and correct copy of the Complaint in this action, dated March 28, 2007, is annexed as Exhibit A.
- A true and correct copy of the Court's Memorandum Decision, dated January 17,
 2008, is annexed as Exhibit B.

I declare, under penalty of perjury, that the foregoing is true and correct.

Dated: May 27, 2008

Jonathan D. Pressment

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